

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARK HOFFMAN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

**BCI ACRYLIC, LLC
D/B/A BATH PLANET**

and

**NORTHWEST BATH SPECIALISTS, LLC
D/B/A BATH PLANET OF SEATTLE**

Defendants.

Case No. 1.25-cv-06107

Judge: Lindsay C. Jenkins

**DEFENDANT NORTHWEST BATH SPECIALISTS, LLC’S AGREED MOTION FOR
ADDITIONAL
TIME TO ANSWER THE COMPLAINT, OR OTHERWISE PLEAD**

Defendant, Northwest Bath Specialists, LLC D/B/A Bath Planet of Seattle (“Northwest Bath”), by and through its attorneys, Burke, Warren, MacKay & Serritella, P.C., moves this Court for entry of an order granting defendant, Northwest Bath an additional thirty (30) days, or until August 1, 2025, to answer or otherwise plead in response to the allegations raised against it in Plaintiff’s Class Action Complaint (“Complaint”), and in support thereof states as follows:

On June 1, 2025, Plaintiff filed a putative class action complaint against co-defendants BCI Acrylic, LLC D/B/A Bath Planet and Northwest Bath, setting forth causes of action for damages and or injunctive relief under the Telephone Consumer Protection Act (47 U.S.C. § 227), the Washington

Consumer Electronic Mail Act (RCW 19.190.060) and the Washington Consumer Protection Act (RCW 19.86.010).

1. Defendant, Northwest Bath was served with a summons on June 12, 2025 .

2. Defendant, Northwest Bath, recently retained the undersigned attorneys to defend it in the above captioned case.

3. In order to have sufficient time to properly assess Plaintiff's Complaint and prepare an answer or other responsive pleading on behalf of Northwest Bath, the undersigned attorney respectfully requests an additional 30 days, or until August 1, 2025 to file an answer or otherwise plead in response to the Complaint.

4. On June 27, 2025 Northwest Bath and counsel for plaintiff conferred via email and agreed, subject to the Court's approval, to extend Northwest Bath's time to answer or otherwise plead to the Complaint to August 1, 2025.

5. This is the first extension requested by any party.

6. The undersigned attorney does not seek an extension of time to prepare a responsive pleading in order to unduly delay the proceedings or to cause prejudice to any party; rather, the additional time is necessary to properly respond to the Complaint.

WHEREFORE, for all the above-stated reasons, Defendant Northwest Bath respectfully requests that this Honorable Court grant his motion and enter an order extending by 30 days, or until August 1, 2025, the date by which he must file an answer or other pleading in response to the Complaint.

Respectfully submitted,

/s/ Christopher Sullivan

Christopher Sullivan

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